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POLITICAL MARKETING INTERNATIONAL, INC.
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March 27, 2025

Chairman Brendan Carr
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Subject: The Campaign Registry and 10DLC Registration.

Dear Chairman Carr and Members of the Federal Communications Commission:

I am writing to express my strong opposition to The Campaign Registry registration requirements for political text messaging. These regulations not only impose unconstitutional restrictions on core political speech but also allow carriers and aggregators to block messages based on content—an alarming violation of the First Amendment. Even more concerning is that The Campaign Registry (TCR), the organization overseeing this process, is a foreign-owned corporation, meaning that political speech in the United States is now subject to the control of an entity that is neither accountable to American voters nor subject to our constitutional protections. (Kaleyra, a global group that provides mobile communication services to financial institutions, e-commerce players, OTT, software companies etc. of Milan, Italy).

My wife and I started PMI in 1998. We are a small firm, with three employees including my wife and I. The Texting portion of our business has become the mainstay of our business. We have felt the financial impact over the past few months as most candidates have never heard of having to register their campaign. Potential clients will contact us about texting and once we let them know about 10DLC Registration and the fees and the timeline to get approved, 95% of them decide against texting. For the first time in over 27 years in business and 45 years in the political arena, we find ourselves asking each other “What are we going to do now if this continues?” Not a question I like asking myself at 64 years of age.

Following are comments I have gotten from companies and candidates alike and I share in those comments.

Unconstitutional Restrictions on Free Speech

Political speech enjoys the highest level of protection under the First Amendment because it is essential to a functioning democratic form of government. Text messaging has become one of the most effective and direct ways for campaigns to communicate with voters. However, requiring campaigns to register through a third-party entity—one that has the potential power to delay, block, or restrict messages—creates an undue burden on political speech.

This raises an urgent question: **Who decides what messages are "acceptable" and what messages get blocked?** If a candidate's message is deemed "controversial" by a private company, does that company now have the authority to silence them? The FCC must not allow telecommunications corporations—whose role should be to transmit, not regulate speech—to dictate which political messages voters are allowed to receive.

Foreign Control Over U.S. Political Messaging

An entity outside the United States has been given the power to determine who is allowed to communicate with American voters. This is an outrageous breach of national sovereignty and raises serious concerns about election security. Political communications in the U.S. should never be subject to foreign oversight, especially not when they involve constitutionally protected speech.

Unreasonable Delays Block Candidates from Last-Minute Voter Contact

It is extremely common for campaigns to plan last-minute GOTV (Get Out the Vote) efforts, especially in the final days. The Campaign Registry requirements create practical and unfair roadblocks for candidates as registration can take up to 10 days. Candidates running for a city council race or even a countywide race

in some states are completely unaware of these regulations until it is too late. Fees must be paid not only to Campaign Verify (to verify your campaign, a one-time $95.00 fee) and then additional fees to the those who deal with The Campaign Registry can charge monthly fees multiplied by how many months you want your campaign to remain active as well as a "Brand" fee, with "Brand" being an example of the name of your campaign. Some campaigns may not receive a "Brand score" high enough that allows them to send out a text to their entire list in one day.

The Campaign Registry and 10DLC Are an Attack on Free Elections

The combination of:

- **Unconstitutional restrictions on political speech**,
- **Foreign control over American campaign messaging**,
- **Potential carrier censorship of political content**,
- **Arbitrary delays that silence candidates during crucial election windows**, and
- **The destruction of small businesses that provided essential campaign services,**
- **Burdensome Registration Process,**
- **Disproportionate Impact on Smaller Campaigns,**
- **Delays in Critical Voter Outreach,**
- **Increased Costs and Financial Strain,**
- **Limited Flexibility for Rapid Response Messaging,**
- **Privacy and Data Concerns,**
- **Lack of Clarity and Consistency in Enforcement…**

…amounts to a blatant attack on free and fair elections. The FCC must take action to prevent private companies—especially foreign-owned entities—from restricting U.S. campaign messaging.

A very successful provider of text messaging for candidates/committees and PAC's that we had contracted with for almost 5 years has this story to share about 10DLC registration…

…To give you some background, I was part of a business that successfully provided peer-to-peer (P2P) texting services for over five years. Our model allowed us to deliver highly responsive, personalized service, and we built a reputation for outstanding customer support. However, the introduction of 10DLC regulations upended everything.

The 10DLC regulations imposed an unnecessarily burdensome and protracted registration process. We were repeatedly told by our provider that unregistered traffic would soon be phased out, prompting us to push our clients to register. But every time we advised our clients to act quickly, the deadlines shifted unexpectedly. These reversals were not minor—they caused chaos for political campaigns with tight election timelines, derailing critical voter outreach efforts.

The prolonged and unpredictable registration process left our clients stranded. Many smaller campaigns, which relied on our flexible P2P texting to engage with voters, simply couldn't complete registration in time. Despite our best efforts to navigate this mess, the damage was irreversible.

After five years of success, these bureaucratic obstacles and the inconsistent enforcement of 10DLC made it impossible for us to continue. This week, we made the painful decision to close our doors—not because we lacked demand or expertise, but because these policies, driven by carrier interests and a foreign-controlled registry, destroyed the ability of small businesses to compete.

While this has been devastating for businesses like mine, the real victims are the candidates, campaigns, and voters. Political speech is among the most protected forms of speech under the First Amendment, yet the FCC has allowed private companies—both domestic and foreign—to regulate and restrict campaign messaging. (February 2025.)

Chairman Carr and Commissioners, I humbly ask the FCC to take immediate action to remove The Campaign Registry / 10DLC requirement in order to protect the integrity of our elections and the constitutional rights of candidates and voters alike.

Thank you for your time and attention to this urgent matter.

Respectfully submitted on the FCC.gov website,

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